

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN
DISASTER SITE LITIGATION

21 MC102 (AKH)
NOTICE TO PRODUCE DOCUMENTS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 34

To: STRUCTURE TONE
c/o William D. Joyce, Esq.
Barry, McTiernan & Moore
2 Rector Street
New York, New York 10006
wjoyce@bmmfirm.com

PLEASE TAKE NOTICE, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 225 Liberty Street – 2 World Financial Center, as referenced in the deposition of Robert Conners, on July 17th, 2012, at or about page as referenced below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.

1. Meeting minutes regarding the work that was performed in 2001, and during the first half of 2002. As requested on or about page 63 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation.

Dated: New York, New York
February 27, 2013

GREGORY J. CANNATA & ASSOCIATES
Plaintiffs- Liaison Counsel

By: _____

Robert A. Grochow, Esq.
233 Broadway, 5th Floor
New York, New York 10279-0003
(212) 553-9205